

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

In re DONALD J. TRUMP, *in his official capacity as  
President of the United States, et al.,*

*Petitioners-Defendants.*

No. 25-\_\_\_\_\_

**CIRCUIT RULE 27-3 CERTIFICATE**

The undersigned counsel certifies that the following is the information required  
by Circuit Rule 27-3:

**(1) Attorneys' contact information**

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**(2) Existence and nature of the emergency**

The district court entered an order compelling the federal government to produce voluminous privileged documents to plaintiffs' counsel and the district court. Specifically, the district court compelled the government to produce plans developed by federal agencies about potential future reorganizations or reductions in their workforces. The government's compliance deadline to produce these plans, subject to a protective order, is noon PDT on Wednesday, July 23, 2025. Production would be an irreversible step that "would seriously undermine agency operations" across the entire Executive Branch.

**(3) Notice to opposing parties**

Prior to filing this motion, the government contacted lead counsel for plaintiffs and informed them of the government's intent to seek a stay pending mandamus and administrative stay. Plaintiffs are opposed to the relief sought in this motion. Upon filing this motion, the government will provide a service copy to plaintiffs' counsel via email.

**(4) Relief sought in district court**

The government requested that the district court stay any order compelling production pending final resolution of any petition for mandamus relief or at least to stay any such order for seven days to allow for orderly appellate review. Dkt. 208 at 18.; *see* Fed. R. App. P. 8(a)(1)(A). By ordering production without addressing that request, the district court implicitly refused to grant a stay.

*/s/ Maxwell A. Baldi*  
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MAXWELL A. BALDI